

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

MOTION TO ASCERTAIN STATUS OF CASE
AND TO AMEND CASE MANAGEMENT ORDER

COMES NOW the Defendants, JERRY HANNAH (“HANNAH”) and VERICHECK, INC., (“VCI”), by and through the undersigned attorney, and requests that this Court conduct a telephonic hearing to ascertain the status of this matter and to amend the Case Management Order.

FACTS

This matter was filed on April 27, 2011. [Docket #1]. On April 24, 2012, a second motion to extend time to complete discovery was granted by the Court. [Docket #38]. The reasoning for the second Motion was that Plaintiff's counsel, Gregory Seneff, was experiencing heart-related heart issues.

After the extension of discovery, on June 18th and 19th, Defendant's counsel commenced the deposition of Plaintiff, Rebecca Devane, in Tennessee. This deposition was suspended by agreement of counsel and was to be later concluded in Georgia at the time of deposition of Defendant Hannah. These depositions were informally agreed by counsel to be conducted in late